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March 1, 2023

BY ECF

Honorable Analisa Torres United States District Judge for the Southern District of New York 500 Pearl Street New York, New York 10007

United States v. Cholo Abdi Abdullah, 20 Cr. 677 (AT)

Dear Judge Torres:

I write in regard to the Court's February 27, 2023, Order (docket number 65), setting a status conference on March 14, 2023. I am unable to appear on March 14, 2023 as I will be in Arizona that week preparing for a suppression hearing in *United States v. Ahmed Mahad Mohamed*, 19-Cr-2162-JGZ-EJM, a two-defendant case. The suppression hearing is scheduled for March 16, 2023, and I return to New York on March 17, 2023. I am available on any date after March 17, 2023, but note that Ramadan starts on March 22, 2023, and ends on April 21, 2023.

To that end, we request that the time between March 1, 2023 and the next court date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow Mr. Abdullah to review the discovery in this case and prepare for trial.

Respectfully submitted,

/s/ Sabrina P. Shroff
Counsel to Mr. Cholo Abdi Abdullah

cc: Mr. Cholo Abdi Abdullah (by mail) Eiad Saleh, United States Marshals Service

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¹ The suppression hearing is scheduled for March 16, 2023. Both defendants are incarcerated and require a Somalian interpreter who is travelling to Tucson, Arizona for the hearing.